

To Whom It May Concern:

The Montana Department of Environmental Quality (DEQ) has prepared the following environmental assessment as required by law in ARM 17.4.607(2) and ARM 17.4.609(2). This project involves installing (3) 30,000 gallon and (2) 30,000 gallon split (24K/6K) Xerxes double wall underground storage tanks storing gasoline and diesel fuels with associated secondarily contained 3 inch double wall fiberglass underground piping at Town Pump Billings #4, 2711 North Frontage Rd., Billings, MT.

The DEQ prepares environmental assessments to inform interested government agencies, public groups, or individuals of a proposed action and to determine whether or not the action may have a significant effect on the human or natural environment. This environmental assessment will be circulated for seven days. After the seven-day comment period, DEQ will decide what action to take regarding this permit.

If you care to comment on this proposed project or the attached environmental assessment, please write or email the Permitting & Compliance Division. Comments must be in writing and must be received by May 16, 2008. Our email address is [ustprogram@mt.gov](mailto:ustprogram@mt.gov) and our mailing address is P.O. Box 200901, Helena, MT, 59620-0901.

Sincerely,

Redge R. Meierhenry  
Environmental Engineer Specialist  
Waste and Underground Tank Management Bureau

enc: Environmental Assessment

O/O NAME: Big Sky Progress, LLC	FACILITY NO: 60-15104
PERMIT NO: 08-0131	DATE OF APPLICATION: April 21, 2008
PERSON PREPARING EA: Redge R. Meierhenry	COUNTY: Yellowstone
LOCATION: 2711 N Frontage Rd, Billings, MT 59101	
FACILITY NAME: Town Pump of Billings #4	EA COMPLETED: April 25, 2008
DESCRIPTION OF PROPOSED ACTION: The proposed scope of work is to install (3) 30,000 gallon and (2) 30,000 gallon spilt (24K/6K) double wall Xerxes underground storage tanks with associated underground Ameron 3 inch double wall fiberglass product piping and 2 inch fiberglass vent piping. Each tank will use continuous secondary containment monitoring for leak detection. Pipe leak detection will be continuous secondary containment monitoring.	
DESCRIPTION OF THE BENEFITS AND PURPOSE OF THE PROPOSED ACTION: Purpose is to install new tanks and piping creating a new refueling station. The benefits include more fuel choices.	

A: Significant unavoidable impacts

B: Potential significant impacts mitigated based upon license conditions

C: Insignificant as proposed

					POTENTIAL IMPACTS	
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
<b>PHYSICAL ENVIRONMENT</b>						
1. <u>TOPOGRAPHY</u> : Are there unusual geologic features? Will the surface features be changed?			X			Location is currently is vacant semi-level grade adjacent to Johnson Lane exit of I-90 Interstate. There are no known or reported unusual geologic features. Tanks and associated piping will be buried underground while appurtenant equipment is above ground. Topography will be changed from vacant land with surface features constructed consistent with retail petroleum re-fueling facility.
2. <u>GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE</u> : Are fragile, compactible or unstable soils present? Are there special reclamation considerations?			X			There are no known special reclamation considerations identified to the reviewer for the project site nor are any fragile or unstable soils identified by this proposal.
3. <u>WATER QUALITY, QUANTITY AND DISTRIBUTION</u> : Are important surface or groundwater resources present? Is there potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality?		X				Important water resources are present. There is Lockwood public water supply distribution system, and may be private groundwater wells nearby, Dry Creek, and Missouri River within 1.25 miles of the proposed site. Violation of ambient water quality standards, drinking water maximum contaminant levels, or

					POTENTIAL IMPACTS	
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
						<p>degradation of water quality is mitigated by installation of double wall fiberglass tanks (non-corroding) and secondarily contained fiberglass non-corroding underground piping.</p> <p>Improper operation of this system would increase the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, and the degradation of water quality. Leak detection systems serve to mitigate the potential impacts immediately reducing the amount of fuel available for release to the environment.</p>
4. <u>AIR QUALITY</u> : Will pollutants or particulate be produced? Is the project influenced by air quality regulations or zones (Class I airshed)?			X			<p>Petroleum vapors will be released at this site, however Stage I vapor recovery is required to reduce vapor releases. Natural air currents and vent pipes will dissipate hydrocarbon vapors to a safe level. There is no Class I area airshed within 15 miles of project site.</p>
5. <u>DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY</u> : Will the project use resources that are limited in the area? Are there other activities nearby that will affect the project?			X			<p>This project will not use existing environmental resources in the local area. There is no other nearby activities identified to the reviewer that may be impacted.</p>

					POTENTIAL IMPACTS	
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
6. <u>IMPACTS ON OTHER ENVIRONMENTAL RESOURCES</u> : Are there other studies, plans or projects on this tract?			X			There are no known other environmental studies, plans or projects on this land parcel and it is not expected that this project would impact other environmental resources on this tract.
7. <u>TERRESTRIAL, AVIAN, AND AQUATIC LIFE AND HABITATS</u> : Is there substantial use of the area by important wildlife, birds or fish?			X			No known use of project site by important wildlife, birds or fish have been identified to the reviewer.
8. <u>VEGETATION COVER, QUANTITY AND QUALITY</u> : Will vegetative communities be permanently altered? Are any rare plants or cover types present?			X			A portion of the existing vegetative community will be altered at the tanks/pipe burial locations, however no rare plants or cover types are reported to the reviewer.
9. <u>UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES</u> : Are any federally listed threatened or endangered species or identified habitat present? Any wetlands? Any species of special concern?		X				No federally listed threatened or endangered species, identified habitat, or species of special concern is identified or reported to the reviewer within 1.5 miles of the project site. There may be Paulustrine wetlands adjacent to the Missouri River within 1.5 miles of project location.
10. <u>HISTORICAL AND ARCHEOLOGICAL SITE</u> : Are any historical, archeological or paleontological resources present?			X			There are no known identified historical structures located within Lockwood. There are no identified archeological or paleontological resources reported to the reviewer.
11. <u>AESTHETICS</u> : Is the project on a prominent topographical feature? Will it be visible from populated or scenic areas? Will there be excessive noise, light or odors?		X				This proposal is aesthetically compatible with the type of land use expected to be found located adjacent to an interstate highway exit. Storage tank equipment will be buried underground with appurtenant equipment above ground that will be visible. Petroleum vapors will be released at this site, however Stage I vapor recovery is required

					POTENTIAL IMPACTS	
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
						to reduce vapor releases.
12. <u>AGRICULTURE</u> : Will grazing lands, irrigation waters or crop production be affected?			X			No known impacts. No agricultural lands are presently in use at project site.
<b>HUMAN ENVIRONMENT</b>						
1. <u>SOCIAL STRUCTURES AND MORES</u> : Is some disruption of native or traditional lifestyles or communities possible?			X			It is not anticipated that the project will disrupt native or traditional lifestyles or communities.
2. <u>CULTURAL UNIQUENESS AND DIVERSITY</u> : Will the action cause a shift in some unique quality of the area?			X			No cultural or diverse unique quality of the area is identified by the reviewer.
3. <u>DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING</u> : Will the project add to the population and require additional housing?			X			It is not anticipated that the project will add to the population or require additional housing.
4. <u>HUMAN HEALTH &amp; SAFETY</u> : Will this project add to health and safety risks in the area?		X				It is anticipated that natural air currents and tank vents will dissipate the hydrocarbon vapors to a safe level. Leak detection equipment is designed to detect releases before serious health or safety problems occur.  Improper operation of this system could impact human health and safety. Leak detection systems and operating requirements mitigate this potential impact by immediately reducing the amount of fuel available to be released into the environment where it could impact health and human safety.
5. <u>COMMUNITY &amp; PERSONAL INCOME</u> : Will the facility generate or degrade income?			X			Development <u>associated</u> with this project (retail of fuel) is reported to the reviewer to not have the potential to generate community or personal income in the local area.
6. <u>QUANTITY AND DISTRIBUTION OF</u>			X			It is not anticipated that

					POTENTIAL IMPACTS	
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
<u>EMPLOYMENT</u> : Will the project create, move or eliminate jobs? If so, estimate jobs.						this project will create or eliminate jobs. However, the project result (retail of fuel) is reported to the reviewer to have the potential to create (15) to (20) additional new local jobs associated with the retail of fuel.
7. <u>LOCAL AND STATE TAX BASE REVENUES</u> : Will the project create or eliminate tax revenue?			X			It is not anticipated that this project will add to the local or state tax base. However, it is anticipated that the fueling operation associated with this proposal will generate additional tax revenue.
8. <u>DEMAND FOR GOVERNMENT SERVICES</u> : Will substantial traffic be added to existing roads? Will other services (fire protection, police, schools, etc.) be needed?			X			It is anticipated that the result of the proposed project will be to add to the local traffic flow using Johnson Lane freeway exit and may add additional traffic along N Frontage Road. Other required services will be minimally impacted as a result of this project.
9. <u>INDUSTRIAL, COMMERCIAL AND AGRICULTURAL ACTIVITIES AND PRODUCTION</u> : Will the project add to or alter these activities?			X			No significant impacts are anticipated that are related to this project.
10. <u>ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES</u> : Are wilderness or recreational areas nearby or accessed through this tract? Is there recreational potential within the tract?			X			No designated recreational or wilderness areas are immediately accessed through the project location.
11. <u>AESTHETICS</u> : Is the project on a prominent topographical feature? Will it be visible from populated or scenic areas? Will there be excessive noise, light or odors?			X			Petroleum storage tank and piping are buried underground. It is anticipated that this project will change the aesthetics of the area that is currently vacant land but be in character with development expected next to a freeway exit.
12. <u>LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS</u> : Are there state,			X			There is no known county, tribal, USFS or BLM environmental management

					POTENTIAL IMPACTS	
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
county, city, USFS, BLM, tribal, etc., zoning or management plans in effect?						plans that would impact this project development. The proposed project and associated development is expected to be in conformance with current Joint City of Billings-County of Yellowstone zoning requirements.
13. <u>TRANSPORTATION</u> : Will the project affect local transportation networks and traffic flow?			X			This project is expected to minimally affect immediately adjacent local transportation network (Frontage Rd). However, the local transportation network appears to be able to accommodate any additional traffic associated with this project.

PUBLIC INVOLVEMENT: The department has attempted to identify interested parties to this application and provide the opportunity for public comment. A copy of this Environmental Assessment of the proposed underground storage tank installation has also been posted at our website (<http://www.deq.state.mt.us/ea.asp>). Substantive comment may also be provided to email address at [ustprogram@mt.gov](mailto:ustprogram@mt.gov)

ALTERNATIVES CONSIDERED: No other alternatives were presented or considered.

COMPLIANCE STATUS: This project, as permitted, will be in compliance with the UST regulations. The facility must, however, be operated and maintained in accordance with the UST rules and regulations. This facility is required to have a compliance inspection done within 120 days of the installation of the tank systems.

RECOMMENDATIONS CONCERNING PREPARATION OF AN EIS: Not necessary at this time based upon the information reviewed. The project, as proposed with mandatory operating and permit conditions, will not have a significant environmental impact.

OTHER GROUPS OR AGENCIES CONTACTED OR WHICH MAY HAVE OVERLAPPING JURISDICTION: The Montana Department of Justice, Fire Prevention and Investigation Bureau regulates aboveground components.

INDIVIDUALS OR GROUPS CONTRIBUTING TO THIS EA: The owner, the contractor, and the preparer of the EA.

PERMIT CONDITION EFFECTS: Permit conditions are based on Montana and federal regulations, PEI RP100-2000 and accepted standard engineering practices.

cc: Governor's Office  
Legislative Environmental Policy Office

Tank Location

